

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

IN RE: SMITTY'S/CAM2 303 TRACTOR  
HYDRAULIC FLUID MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

MDL No. 2936

Master Case No. 4:20-MD-02936-SRB

This document relates to:  
All Class Actions

**DECLARATION OF WILLIAM WICKERSHAM**

I, William Wickersham, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am Vice-President of Business Development and Client Relations at RG/2 Claims Administration, LLC ("RG/2"). I am over 21 years of age and not a party to this action. This Declaration is based on my personal knowledge. If called as a witness, I could and would testify competently to the facts stated herein.

2. RG/2 was proposed by Class Counsel and approved by the Court to administer the funds received in the Class Action Settlement between Plaintiffs and Manufacturer Defendants Smitty's Supply, Inc. and CAM2 International LLC ("Manufacturer Settlement Agreement"), MDL 2936. That selection followed our preparation of a settlement administration proposal and budget for the administration of the Manufacturer Settlement RG/2 provided to Class Counsel. There was no formal engagement agreement or contract between Class Counsel and RG/2, beyond the terms of the proposal and budget provided to, and approved by, Class Counsel and the Court. The bulk of the costs reflected in that budget were for notice and media costs.

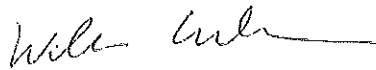
3. RG/2 was not asked for, has not paid, and will not be paying, any fees or other

monies of any kind to Class Counsel in exchange for our selection or administration.

4. Huntington Bank was selected to be the escrow bank to hold the funds received in connection with the Manufacturer Settlement, pending disbursement. Huntington Bank's role as Escrow Agent was based on the responsiveness and services along with no fee banking provided by Huntington Bank. No monies were promised or paid by Huntington Bank to RG/2 in exchange for its selection to hold the settlement funds.

5. A copy of the reconciliation of the Huntington Bank account, showing all monies received and all disbursements as of May 31, 2025, is attached as Exhibit A. Pursuant to the Confidential Class Action Settlement Term Sheet Key Provisions, attached as Exhibit 1 to the Custodian/Escrow Agreement, the names of those paying into the account to fund the settlement are not individually listed.

Executed on June 11, 2025



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William Wickersham

## Exhibit A

Smittys/Cam2 303 Settlement Fund Reconciliation through 5/31/25

Contributions:

[redacted]	\$ 1,000,000.00
[redacted]	\$ 300,000.00
[redacted]	\$ 62,500.00
[redacted]	\$ 62,500.00
[redacted]	\$ 62,500.00
[redacted]	\$ 62,500.00
Interest through 5/31/25	\$ 8,750.94

Distributions:

<u>Nature of Expense</u>	<u>Payee</u>	
Publication and Media	Mitchell + Resnikoff	\$ 518,178.00
Postage	Metro Action Group LLC	\$ 102,000.00
Administration Fees and Expenses	RG/2 Claims Administration, LLC	\$ 102,679.00
Publication and Media	Mitchell + Resnikoff	\$ 10,000.00
Publication and Media	Mitchell + Resnikoff	\$ 16,163.26
Administration Fees and Expenses	RG/2 Claims Administration, LLC	\$ 72,958.00
		\$ (821,978.26)
	Ledger Balance	\$ 736,772.68
	Bank Balance 5/31/25	\$ 736,772.68